

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

J.Y.C.C., <i>et al.</i> ,)	
)	Case No. 4:15-cv-01704-RWS
Plaintiffs,)	
)	
v.)	
)	
THE DOE RUN RESOURCES)	
CORPORATION, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF CRYSTAL SALING

I, Crystal Saling, hereby declare that:


1. I am Vice President - Law and General Counsel for The Doe Run Resources Corporation (“DRRC”).
2. I am competent in all respects to make this declaration and have personal knowledge of the matters stated herein.
3. I have reviewed Plaintiffs’ Motion to Enforce or Supplement this Court’s Protective Order of March 24, 2022 and Memorandum in Support (“Motion”), ECF Nos. 701-02, filed on October 7, 2022.
4. I am providing this declaration solely to correct certain misrepresentations in Plaintiffs’ Motion, as set forth in more detail below.
5. In their Motion, Plaintiffs allege that Doe Run Peru formerly employed Miguel Roberto Huanay Bonilla (“Mr. Huanay”). (Motion at 3.) Plaintiffs further allege that Mr. Huanay has been and is presently acting as “counsel for Defendants in Peru.” (*Id.* at 1.) This is

false. It is my understanding that Mr. Huanay was employed approximately 15 years ago by non-party Doe Run Peru. To my knowledge, he has never been employed by any Defendant in this action. Mr. Huanay is not DRRC's counsel in Peru or anywhere else. He is not employed or compensated by DRRC, he is not an agent or representative of DRRC in any capacity whatsoever, and he has no authority to act or speak on DRRC's behalf. DRRC does not control or direct the actions or communications of Mr. Huanay.

6. Plaintiff's Motion further alleges that Mr. Huanay "has been persistent in his efforts to contact [represented Plaintiffs] in an attempt to make settlement offers and garner claim releases for cases pending before this Court, all without the knowledge of [Plaintiffs'] counsel." (Motion at 3.) Again, DRRC does not control or direct the actions or communications of Mr. Huanay. Moreover, DRRC has not entered into any settlement agreements or made any settlement payments to any Plaintiff or their legal representatives in this litigation through Mr. Huanay or any other individual.

I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Executed on October 21, 2022


Crystal Saling